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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA

GALLATIN WILDLIFE
ASSOCIATION,
YELLOWSTONE BUFFALO
FOUNDATION

Plaintiffs,

vs.

UNITED STATES FOREST
SERVICE; *et al.*,

Defendants

HELLE LIVESTOCK, *et al.*,

Defendant-Intervenors

CV-15-27-BU-BMM

NOTICE OF DOCUMENTS

The following exhibits are documents that Plaintiffs' counsel referenced during the March 7, 2018 hearing. Exhibit 1 is an exhibit to a declaration from Forest Service employee Jan Bowey that indicates a member of the public and a BLM Range Management Specialist reported a dead bighorn sheep on the Black Butte domestic sheep allotment. Exhibit 2 are maps that were produced in preparation of the supplemental NEPA for the MOU that do not display the dead bighorn sheep on the Black Butte domestic sheep allotment. Exhibit 3 is a page from the 2018 Final Supplemental NEPA analysis for the MOU, which states:

In the 13 years since bighorn sheep were reintroduced to the Greenhorn Mountains, bighorn sheep and permitted domestic sheep on the BDNF have not been found in close proximity.

It is reasonable to assume, based on the past 13 years of bighorn sheep presence, this trend of acceptable separation between the species will continue in the recent future.

Exhibit 4 is a 2017 non-NEPA document that the Forest Service produced stating:

Commingle and risk of contact resulting in pathogen exposure and possible disease transmission is a concern for Greenhorn bighorn sheep venturing . . . on the domestic sheep allotments in the Gravelly Mountains.

In terms of management of the BDNF domestic sheep allotments in relation to the bighorn sheep, spatial separation has been maintained between the BDNF domestic sheep allotments and bighorn sheep.

Exhibit 5 is an investigative report from the U.S. Fish and Wildlife Service obtained through a Freedom of Information Act Request that details an "illegal" grizzly bear killing by the domestic sheep permit holders. Exhibit 6 is an offer to discuss a "buy out" that was sent to the domestic sheep permit holders to compensate them to permanently end domestic sheep grazing in the Gravelly Mountains.

Respectfully submitted this 8th day of March 2018.

/s/ John Meyer
JOHN MEYER

Attorney for Plaintiffs